

Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

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**Recommendation 15-3: Proposed Minimum Hours for Helicopter Air Ambulance (HAA) Operator Training Curriculums**

**I. Submission**

The recommendations below were submitted by the Air Carrier & Contract Training Workgroup (AC&CT WG) for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at F2F-4. The ACT ARC Steering Committee adopted the recommendations, which are submitted to the Associate Administrator for Aviation Safety (AVS-1) as ACT ARC Recommendation 15-3.

**II. Statement of the Problem**

The Federal Aviation Administration (FAA) posed a series of questions to obtain industry input for a Congressionally-mandated rulemaking, including the following questions related to Helicopter Air Ambulance (HAA) Training Programs:

1. What amount of hours should be required for pilot initial and recurrent flight and ground training in an HAA training curriculum?
2. Should there be a minimum hours requirement for any other pilot training?
3. Is there a way to incentivize HAA operators to use flight simulation training devices instead of training in a helicopter?

After the ACT ARC Steering Committee assigned the task to the AC&CT WG, the AC&CT WG formed the Helicopter Air Ambulance Training Action Team, which included industry subject matter experts to review, discuss, and propose recommendations in response to the questions posed.<sup>1</sup>

**III. Proposed Recommendations**

The AC&CT WG proposes the following recommendations for ACT ARC Steering Committee consideration:

The ACT ARC recommends the FAA suggest the following minimum hours for pilot initial and recurrent flight and ground training in Helicopter Air Ambulance (HAA) operator training curriculums:

Additional HAA Flight Training <sup>1</sup>		Aircraft Ground Training <sup>2</sup>	
Initial	Recurrent	Initial	Recurrent
VFR – 4	VFR/NVG – 1	VFR – 24	VFR – 4
IFR – 10	IFR – 1	VFR Transition – 20	
NVG – 5 <sup>3</sup>		IFR – 32	IFR – 8
		IFR Transition – 24	

Note 1: The recommended hours are for additional HAA-specific flight training. The recommendations contemplate that HAA operators would have at least this number of hours with the total number of flight training hours addressing HAA-specific requirements, as well as other 135 training requirements.

Note 2: Aircraft ground training may include platform instruction, computer based training (CBT), practical/oral testing, preflight action, starting/shut-down procedures, etc.

Note 3: NVG flight training may be used to satisfy VFR flight training requirements.

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<sup>1</sup> The HAA Training Action Team included subject matter experts representing operators and industry associations: Air Evac Lifeteam, Air Medical Operators Association (AMOA), Air Methods, California Shock Trauma Air Rescue (CALSTAR), Helicopter Association International (HAI), Metro Aviation, National EMS Pilots Association (NEMSPA), and PHI Air Medical.

Further, the ACT ARC recommends the FAA allow HAA operators to accomplish training and/or checking tasks in a simulator and/or training device, provided that simulator or training device is qualified under 14 CFR part 60 to accomplish the task/check. In addition, the ACT ARC recommends the FAA publish guidance clarifying which tasks can be completed in various levels of training devices.

Further, the ACT ARC recommends that the FAA allow at least 18 months prior to the effective date (implementation) of any HAA operator specific training requirements to allow for the time necessary for the FAA to develop guidance for operators and inspectors so that operators and update training curriculums and FAA inspectors can approve and review those curriculums. In addition, current HAA operators (holding Operations Specification (OpSpec) A021 authorization) would receive credit for any training conducted under an FAA-approved training program prior to the effective date of any new requirements.

#### **IV. Rationale**

The recommendations regarding minimum HAA-specific training hours are based on current industry data, experiences and best practices, as well as analysis of HAA accidents and the resulting National Transportation Safety Board (NTSB) recommendations. The HAA Training Action Team emphasized that the recommended minimum HAA flight training hours should be a part of the existing required training program since the recommended flight training hours represent the additional hours required for a pilot already qualified under the operator's 14 CFR part 135 Training Program to become a qualified HAA pilot. The HAA minimum hours could be integrated in required training (concurrent with other 135 training requirements) as long as the flight training segment is at least as long as the recommended minimum hours. The HAA Training Action Team did not believe there should be a minimum hours requirement for any other pilot training for HAA pilots.

The HAA industry has been working to develop voluntary standards for pilot training through establishment of the Commission for Accreditation of Medical Transport Systems (CAMTS). Many HAA operators already require pilot candidates meet CAMTS standards, which exceed current regulatory guidance.

14 CFR part 60 already regulates training devices and simulator training. All training devices and simulators are already approved (or not approved) for given tasks. An HAA operator can work with its Principal Operations Inspector (POI) to ensure that where part 60 allows credit for a task in a training device or simulator, the task(s) can be incorporated in the operator's training program so that HAA operators can transition to simulator-based training (to the extent possible and practical).

Training and checking in a training device or simulator is a safer means of training and checking. Operators have many incentives already in place to better use training devices and simulators for both training and checking events, provided revised FAA guidance clarifies the parameters.

Finally, the HAA Training Action Team discussed the importance of lead time for implementation of new requirements to allow the FAA to implement inspector handbook guidance that would help to ensure consistent application of the new requirements from office-to-office and region-to-region, as well as advisory guidance for operators regarding sample methods by which operators might comply with the requirements. In addition, because the hours are based on current industry best practice, the Action Team discussed the importance of defining the applicability of new requirements noting that pilots currently employed by operators authorized to conduct HAA operations with an FAA-approved training program should not be required to complete “initial training” again. Current HAA pilots should be “grandfathered” into the new HAA Training requirement so that for operators that currently hold Operations Specifications (OpSpec) Paragraph A021, only the recurrent requirements apply.

## V. Background Information

### ACT ARC Initiative:

These recommendations address Part I of the tasking associated with the following Steering Committee Initiative:

Initiative #31: Develop guidance for Helicopter Air Ambulance (HAA) operations under 14 CFR part 135 with regard to:

- HAA Pilot Training Program curriculums
- Incorporating Line Oriented Flight Training (LOFT) into pilot training curriculums
- Crew Resource Management (CRM) training

### Source Requirement:

Public Law 112-95, § 44730. Helicopter air ambulance operations

§ 44730(e). SUBSEQUENT RULEMAKING.—

(1) IN GENERAL.—Upon completion of the rulemaking required under subsection (b), the Administrator shall conduct a follow-on rulemaking to address the following:

(A) Pilot training standards, including—

- (i) mandatory training requirements, including a minimum time for completing the training requirements;
- (ii) training subject areas, such as communications procedures and appropriate technology use; and
- (iii) establishment of training standards in—

(I) crew resource management;

(II) flight risk evaluation;

(III) operational control of the pilot in command; and

(IV) use of flight simulation training devices and line-oriented flight training.

(B) Use of safety equipment that should be worn or used by flight crewmembers and medical personnel on a flight, including the possible use of shoulder harnesses, helmets, seatbelts, and fire resistant clothing to enhance crash survivability.

(2) DEADLINES.—Not later than 180 days after the date of issuance of a final rule under subsection (b), the Administrator shall initiate the rulemaking under this subsection.

(3) LIMITATION ON CONSTRUCTION.—Nothing in this subsection shall be construed to require the Administrator to propose or finalize any rule that would derogate or supersede the rule required to be finalized under subsection (b).

Note: Reference *Helicopter Air Ambulance, Commercial Helicopter, and Part 91 Helicopter Operations Final Rule* ([79 FR 9932](#) published February 21, 2014—effective date extended to April 22, 2015) for Congressionally mandated rulemaking required by P.L. 112-95 § 44730(b).